

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

**GILBERTO CASTRO NIEVES
LILIA MARIA MUNOZ VINUEZA
DEBTOR(S)**

CASE NO. 10-01579 ESL

CHAPTER 13

RESPONSE TO TRUSTEE'S MOTION TO MODIFY PLAN

TO THE HONORABLE COURT:

Comes now Debtors, represented by the undersigned attorney, and respectfully STATE,
ALLEGE and PRAY:

1. On December 7, 2010 Chapter 13 Trustee Alejandro Oliveras Rivera, filed a motion to modify plan alleging the current plan does not provide for the secured Creditor CRIM, Claim #8.

2. CRIM's claim #8 corresponds to Real Estate owned by Plaza Las Americas, Inc.

3. Debtors do not have and never had an ownership interest over said property.

4. Debtors allege that the party responsible for said Claims is the owner of such property.

5. Debtors allege lack of specificity in the information and documentation in support of Claim #8 to establish an obligation connecting Debtors as the responsible parties in interest in connection with the debt claimed.

6. An objection to Claim #8 will be filed separately.

WHEREFORE the undersigned attorney for Debtor requests from this Honorable Court to deny Trustee's motion to modify plan.

RESPECTFULLY SUBMITTED.

CERTIFICATE OF SERVICE: I hereby certify that on this same date I electronically filed the above document with the Clerk of the Court using the CM/ECF System which will send a notification of such filing to all CM/ECF participants who registered for receipt of notice by electronic mail, particularly to Alejandro Oliveras Rivera, Chapter 13 Trustee. I further certify that the foregoing has been served to the U.S. Trustee at ustpreregion21.hr.ecf@usdoj.gov.

In San Juan, Puerto Rico, January 5, 2011.

s/JOSE L. JIMENEZ QUINONES

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